

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

CATRECE DENENE FOSTER,

DEBTOR.

**Case No.: BK-14-11219-NLJ
Chapter 13**

RESPONSE TO OBJECTION TO CLAIM BY TRUSTEE

Comes now the secured creditor, BANK OF AMERICA, N.A., by their attorney, Robert J. Hauge, and responds to Objection to Claim Number 12 filed by the Trustee on August 12, 2014:

1. BANK OF AMERICA, N.A. is the holder of a purchase money note and mortgage on the Debtor's residence (the "Property"). The note has an outstanding balance of \$54,597.53 plus accruing interest along with reasonable attorney fees and for all costs of the action. Secured Creditor, BANK OF AMERICA, N.A. timely filed its proof of claim on July 18, 2014. The proof of claim included an arrearage claim in the amount of \$570.19 comprised of a late charge and escrow shortage. The Court had established the deadline for filing proof of claims as August 6, 2014. The debtor should be required to modify her chapter 13 plan to provide for the payment of the timely filed arrearage claim.

2. This response is to protect Creditor's rights regarding its proof of claim and Creditor reserves the right to supplement this response. Counsel for BANK OF AMERICA, N.A. is currently researching the items raised in the Objection.

WHEREFORE, PREMISES CONSIDERED, BANK OF AMERICA, N.A. prays this Court deny the Objection; and for such further relief as this Court deems appropriate.

BANK OF AMERICA, N.A.,

By: s/ Robert J. Hauge
Robert J. Hauge - #20007
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Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Response with postage thereon fully prepaid to the parties listed below on August 20, 2014.

Catrece DeNene Foster
1212 NW 98th
Oklahoma City, OK 73114

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Tearsa Storms Olson
2400 NW 23rd St.
Ste. 102
Oklahoma City, OK 73107

By: s/ Robert J. Hauge
Robert J. Hauge